

## **REMARKS**

The Examiner is thanked for removing the finality of the previous office action.

Claims 1-25 are now rejected under 35 U.S.C. 103(a) as being unpatentable over the newly cited Nagata et al. (EP 0 637 171 A2) in view of Bridson et al. (US 6,359,270) and further in view of the previously cited Morgenthaler (US 6,310,609). This rejection is respectfully disagreed with, and is traversed below.

In rejecting the independent claims 1, 10, 17 and 26 the Examiner uses the telex television remote control of Nagata et al., having fixed Red, Green, Yellow and Cyan colored keys 25 (see Fig. 17), in combination with Bridson's touch screen display on the door of a microwave oven for connecting to the Internet, in combination with the illumination of keys in Morgenthaler for guiding a user through operation of a device (e.g., a telephone) without having to refer to a user's manual. The Examiner takes the position that it would have been obvious to one skilled in the art to incorporate the markup language file function of Bridson and illuminating at least one character-entry pressure point having a character encoding as taught by Morgenthaler in the system of Nagata et al. in order to allow the user to "access to the internet easily and highlight portions of a display, easily select the functions by inputting specific illuminating associated with the function and to improve the performance".

It is not admitted that one skilled in the art would be led to combine the teachings of these three references in the manner done by the Examiner. Further, and if such a combination were to be accomplished (without admitting that such as combination is suggested or technically functional), the resulting device and/or method would still not render the claimed invention unpatentable or obvious to one skilled in the art.

Claim 1 recites:

A method in a device having a plurality of character-entry pressure points for selecting

- a function in a markup language file comprising:
  - a) reading the markup language file;
  - b) detecting a reference to a character encoding having a corresponding function;
  - c) illuminating at least one character-entry pressure point having a character encoding;
  - d) detecting an entry by the character-entry pressure point; and
  - e) triggering the function.

Claim 10 recites:

A method for selecting a navigation function in a markup language file comprising:  
reading the markup language file;  
detecting a reference to a character encoding having a corresponding navigation function;  
illuminating a character-entry pressure point having a character encoding;  
detecting a pressure actuation of the character-entry pressure point; and  
triggering the navigation function.

Claim 17 recites:

A device having a plurality of character-entry pressure points for selecting a function in a markup language file comprising:

- a) means for reading the markup language file;
- b) means for detecting a reference to a character encoding having a corresponding function;
- c) means for illuminating at least one character-entry pressure point having a character encoding;
- d) means for detecting an entry by the character-entry pressure point; and
- e) means for triggering the function.

Finally, claim 26 recites:

A wireless device comprising a CPU programmed to parse a file to identify at least one occurrence of a string representing a hyperlink and to associate individual ones of identified string occurrences with individual ones of colors associated with a manual user data entry device of said wireless device.

It will now be shown that the subject matter of these independent claims is not disclosed or suggested by the Examiner's proposed combination of prior art.

First, and referring to Nagata et al. at col. 1, line 56, to col. 2, line 11, and to claim 17, the keys

21, 22, 23 and 24, collectively referred to as 25, on the television operating remote controller are arranged to have fixed colors for use with the European teletext function. The user selects a desired program by depressing one of the color keys 25 that has the same color as the color of the characters indicating the field of that program on the display 19 of the receiver 1. The programs appear to be "News" "Sports", as shown in Fig. 10.

It is important to note that the use of other than the fixed color keys 25 is not suggested (e.g., keys that could have colors turned off and on as needed), as a problem encountered by Nagata et al. is that in regions where the service is not offered, the fixed color keys on the remote controller become unnecessary, requiring the provisioning of two types of remote controllers, i.e., those having the color keys 25 and those without (see col. 3, lines 42-57).

Second, Bridson uses a touch screen display with, for example, a microwave appliance (or as a stand-alone unit). As is stated in col. 11, lines 9-11:

"So far as the user is concerned, **all operation of the communications module 12 will be via the touch screen, or by an IR remote control (not shown)"** (emphasis added);

and at col. 16, lines 64-67:

"The touch mouse driver 59 translates touch events on the touch screen into mouse events. Such a driver 59 will generally be available from the touch screen hardware vendor."

Thus, Bridson teaches the use of a touch screen interface having a mouse driver functionality that would be used, presumably, if one wished to click on a banner add, etc. (see Figs. 11, 12 and 13, and col. 20, lines 45-65). Text input capability is provided by displaying a virtual full qwerty keyboard (see col. 15, lines 41-45).

In other words, Bridson provides a full graphical user interface to the user, including a mouse and a full qwerty keyboard, in what appears to be a not substantially constrained area. For example,

see col. 10, lines 49-65, where it is stated that:

"With the exception of a thin peripheral frame 19 that wraps around the edges of the communications module 12, substantially the entire front of the communications module 12 is defined by an LCD display 20 having a touch screen overlay that is not visible in the drawings. The **LCD display 20 is a widely-available and economical 12.1"-diagonal TFT-type flat panel** including a backlight facility, although it may be possible to use a lower-cost alternative such as a reflective-type LCD that does not require backlight control. Of course, the size of the LCD display 20 will ultimately be dictated by the size of the microwave oven door. **Display resolution of 800x600 is deemed adequate for present purposes**, operating on an SVGA input signal" (emphasis added).

This being the case, it is not seen where one skilled in the art would wish to modify Bridson to include the use of illuminated keys associated with character encoding(s) detected in a markup language file, as, for example, Bridson provides the user with a full user interface enabling the user to click on banner adds with an emulated mouse function, as well as to enter alphanumeric text using a full keyboard.

The Examiner then again uses the commonly assigned Morgenthaler patent for purportedly teaching illuminating at least one character-entry pressure point having a character encoding.

It is again respectfully pointed out that in accordance with the commonly assigned Morgenthaler U.S. Patent:

"By selectively illuminating one or more of the light sources, the associated key will be identified to the user. By illuminating only those keys which provide valid responses for any given operation, the operator is guided through the proper operation of the telephone without referring to the written manual or user's guide. Moreover, by identifying the proper keys to accomplish a particular menu command sequence, the user may more quickly complete the menu selection and is less likely to initiate an undesired command by pressing a wrong key." (col. 5, lines 43-52, emphasis added); and

"If no keys are pressed, the lights remain off, as shown in step 406. However, in the event a key is pressed by the user, the user interface illuminates the available

keys in step 410 such that the user may easily identify the keys which will perform a valid function." (col. 6, lines 19-23, emphasis added).

As is stated in the Abstract, the user interface of Morgenthaler includes "a means for identifying the appropriate keys on the keypad which correspond to the step or steps required to activate a desired operation to be performed within the device."

That is, the illumination of keypad keys in Morgenthaler is beneficially used to aid the user in activating desired operations and functions, such as by navigating through a particular menu command sequence without having to refer to a user's manual or guide. In Morgenthaler, the keys that are illuminated are "the appropriate keys on the keypad which enable a particular command to be performed within the telephone" (see col. 3, lines 53-56).

This being the case, it is clearly not admitted that one skilled in the art would be led to combine the teachings of Nagata et al., Bridson and Morgenthaler as attempted by the Examiner. As was stated above, Nagata et al. teach only that a television operating remote controller is conventionally arranged to have four fixed colors (R, Y, G, C) for use with the European teletext function. Bridson provides a display capable of showing banner adds, etc. to a user for inviting the user to click through a displayed banner add, and to facilitate this process provides a user interface having at least a mouse function and a full qwerty keyboard function. Morgenthaler employs an illumination of keypad keys to aid the user in activating desired operations and functions, such as by navigating through a particular menu command sequence without having to refer to a user's manual or guide. It is thus not seen how one skilled in the art would be led to look to the four fixed color keys on the TV remote control of Nagata et al., and to the full graphical user interface provided by the unit of Bridson, and to the selective illumination of keypad keys in the menu selection and navigation function of Morgenthaler, to arrive at a solution to the problem that is addressed and solved in accordance with embodiments of this invention.

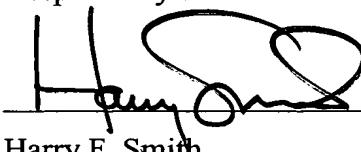
This being the case, the independent claims 1, 10, 17 and 26 are clearly not rendered obvious or

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unpatentable by the Examiner's proposed combination of the television operating remote controller having four fixed colors (R, Y, G, C) of Nagata et al., the display capable of showing banner adds, etc. to a user and a user interface having at least a mouse function and a full qwerty keyboard function of Bridson, and the phone menu navigation aid of Morgenthaler, that uses illuminated keypad keys to guide a user through the various menu levels and selections.

In that the independent claims 1, 10, 17 and 26 are all clearly patentable over the proposed combination of Nicholas et al. and Morgenthaler, then the dependent claims 2-9, 11-16, 18-25 and 27-29 are also all clearly patentable. The Examiner is respectfully requested to reconsider and remove the rejection, and to allow claims 1-29 as shown above.

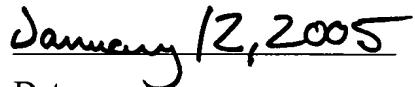
Respectfully submitted:



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